

Moore & Van Allen

November 21, 2005

VIA UPS EXPRESS**INTERVENOR****#21/19/05 1030****James H. Jeffries IV**
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Moore & Van Allen PLLC

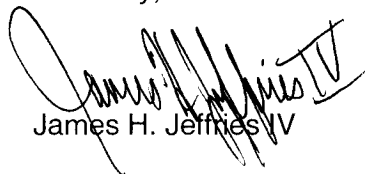
Suite 4700
100 North Tryon Street
Charlotte, NC 28202-4003Mr. Charles Terreni
Chief Clerk Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210**Re: Docket No. 2005-270-G Request for Investigation to Determine Whether a Regulation Should Be Promulgated Requiring Relocation of Certain Meter Sets or Installation of Splash Guards On These Meter Sets**

Dear Mr. Terreni:

Pursuant to 26 S.C. Code Ann. Regs. 103-869(C)(Supp.2004) and the October 26, 2005 Docketing Department letter, enclosed please find an original and 26 copies of the *Petition to Intervene of Piedmont Natural Gas Company, Inc.* in the docket shown above. Please accept the original and 25 copies for filing and return the additional "file-stamped" copy in the enclosed self-addressed stamped envelope.

Thank you for your assistance with this matter. If you have any questions about this filing you may reach me at the number shown above.

Sincerely,


James H. Jeffries IV

JHJ/bao

Enclosures

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SC PUBLIC SERVICE
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**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2005-270-G

RECEIVED
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COMMISSION

In the Matter Of)
)
Request for Investigation to Determine Whether)
A Regulation Should Be Promulgated Requiring)
Relocation of Certain Meter Sets or Installation)
Of Splash Guards On These Meter Sets)

PETITION TO INTERVENE

Piedmont Natural Gas Company, Inc. ("Piedmont") hereby petitions the Public Service Commission of South Carolina ("Commission") pursuant to Rule 103-836 of the Commission's Rules and Regulations, for permission to intervene and to be made a party of record in the above-captioned docket. In support of this petition, Piedmont alleges as follows:

1. Piedmont is incorporated under the laws of the state of North Carolina and is duly authorized by its Articles of Incorporation to engage in the business of transporting, distributing and selling natural gas. It is duly domesticated and is engaged in conducting the business above-mentioned in the states of South Carolina, North Carolina and Tennessee. Piedmont is a public utility under the laws of this State, and its public utility operations in South Carolina are subject to the jurisdiction of this Commission.

2. Any notices or other communications with respect to this Petition should be sent to:

Kim R. Cocklin
Senior Vice President and General Counsel
Piedmont Natural Gas Company, Inc.
P.O. Box 33068
Charlotte, NC 28233
Telephone: (704) 364-3120
Email: kim.cocklin@piedmontng.com

And

James H. Jeffries IV¹
Moore & Van Allen PLLC
Bank of America Corporate Center
100 North Tryon Street, Suite 4700
Charlotte, North Carolina 28202-4003
Telephone: (704) 331-1079
Email: jimjeffries@mvalaw.com

And

Kerry McTigue
Nelson Mullins Riley & Scarborough, LLP
1320 Main Street, Suite 1700
Columbia, South Carolina, 29201
Telephone: (803) 255-9218
Email: kerry.mctigue@nelsonmullins.com

3. The Commission has established this proceeding to review potential hazards arising from the use of certain meter set configurations by natural gas local distribution companies.

4. The Commission has assigned Docket No. 2005-270-G to the referenced matter and set a hearing for January 19, 2006.

5. Piedmont has a direct and material interest in the issues to be addressed and resolved by the Commission in this docket.

6. Given the state of the record at this stage of the proceedings, Piedmont lacks sufficient information to fully develop and state its position in this proceeding at this time.

7. Granting Piedmont's request to be made a party of record in the above-captioned proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing its views and concerns can be developed.


¹ Mr. Jeffries is concurrently requesting admission to practice before this Commission in this matter *pro hac vice* in conformance with the rules of the South Carolina Supreme Court.

WHEREFORE, Piedmont Natural Gas Company, Inc. prays for the following relief:

1. that this Petition to Intervene be granted by the Commission and that Piedmont be made a formal party of record to this proceeding;
2. that Piedmont be allowed to participate fully in this proceeding and to take such positions as it deems advisable; and
3. that such other and further relief be granted as is just and proper.

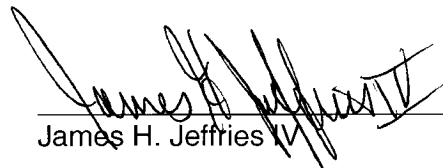
Respectfully submitted, this the 21st day of November 2005.

PIEDMONT NATURAL GAS COMPANY, INC.


Kerry McTigue

OF COUNSEL:

Nelson Mullins Riley & Scarborough, L.L.P.
1320 Main Street, Suite 1700
Columbia, South Carolina 29201
Telephone: (803) 255-9218


James H. Jeffries IV

OF COUNSEL:

Moore & Van Allen PLLC
Bank of America Corporate Center
100 North Tryon Street, Suite 4700
Charlotte, North Carolina 28202-4003
Telephone: (704) 331-1079

CERTIFICATE OF SERVICE

The undersigned hereby certifies that five copies of the attached Petition are being served this date via UPS Express upon:

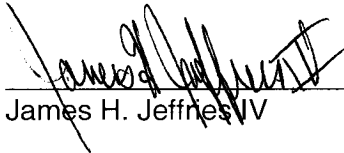
Shannon Bowyer Hudson, Counsel
Office of Regulatory Staff
1441 Main Street
Suite 300
Columbia, South Carolina 29201

And that one copy of the attached Notice is being served this date on the other parties to this proceeding by U.S. Mail addressed as follows:

Jan M. Ayer
1140 Ridgecrest Avenue
North Augusta, South Carolina 29841

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SC PUBLIC SERVICE
COMMISSION

This the 21st day of November, 2005



James H. Jeffries IV